

PROVIDER REFERENCE MODULE

Medical Practitioner Reimbursement

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POLICIES AND PROCEDURES AS OF OCTOBER 1, 2017

VERSION: 2.0

Version	Date	Reason for Revisions	Completed By
1.0	Policies and procedures as of October 1, 2015 Published: February 25, 2016	New document	FSSA and HPE
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1.1	Policies and procedures as of April 1, 2016 Published: July 28, 2016	Scheduled update	FSSA and HPE
1.2	Policies and procedures as of April 1, 2016	CoreMMIS update	FSSA and HPE
	(CoreMMIS updates as of February 13, 2017)		
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2.0	Policies and procedures as of October 1, 2017 Published: June 7, 2018	Scheduled update: • Edited and reorganized text as needed for clarity • Updated information about the Fee Schedule in the Introduction section, and specified the Professional Fee Schedule throughout the module • Added physician assistant to the list of practitioners reimbursed at less than 100% and updated the list of providers that cannot enroll in the IHCP in the Mid-Level Practitioners section • Updated the Advanced Practice Nurses section to reflect new policies • Updated the Physician Assistants section to reflect new polices • Added modifier descriptions in the Surgery-Related Modifiers Affecting Payment section • Added the Reimbursement for Electronic Health Records Incentive Program section	FSSA and DXC
2.0	Policies and procedures as of October 1, 2017 Published: June 19, 2018	Corrected August 1, 2018, date to August 1, 2017, in the <i>Physician Assistants</i> section	FSSA and DXC

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Introduction

Physicians, limited license practitioners, and other medical practitioners that bill the Indiana Health Coverage Programs (IHCP) on a fee-for-service basis receive a resource-based relative value scale (RBRVS) method of reimbursement.

With the exception of providers contracted with a managed care plan, practitioners are reimbursed at the lower of the submitted charge or the established statewide RBRVS Fee Schedule allowance for the procedure.

Note: The IHCP <u>Professional Fee Schedule</u> is located at indianamedicaid.com and can be downloaded free of charge. The Professional Fee Schedule is automatically updated each week or as needed.

The Professional Fee Schedule contains a complete list of Current Procedural Terminology (CPT®1) and Healthcare Common Procedure Coding System (HCPCS) codes, and includes indicators specific to each code, such as program coverage, reimbursement, and prior authorization.

Resource-Based Relative Value Scale Components

The IHCP Professional Fee Schedule for physician services uses the RBRVS reimbursement methodology. RBRVS was designed to represent the resource costs associated with providing physician services for a more equitable reimbursement structure. RBRVS incorporates three components of physician services:

- Physician work Work is measured by the time and intensity of the physician's effort in providing a service.
- Practice expense Practice costs include items such as office rent, salaries, equipment, and supplies.
- Malpractice expense Malpractice expense is measured by professional liability premium expenses.

The components of the RBRVS reimbursement methodology include the Medicare-based relative value units (RVUs) and a conversion factor. Individual RVUs for each procedure have been developed to represent the resource use associated with individual procedures. The IHCP Professional Fee Schedule is based on statewide RVUs. The RVUs were adjusted to reflect work, practice, and malpractice costs in Indiana. Indiana specifically developed a statewide geographic practice cost index (GPCI) as follows:

- Physician work − 1.000
- Practice expense 0.922
- Malpractice expense 0.615

To compute the payment rate for a procedure under the IHCP Professional Fee Schedule, the base RVU must be calculated according to this formula:

Total Base RVUs = (Work RVU \times Work GPCI) + (Practice RVU \times Practice GPCI) + (Malpractice RVU \times Malpractice GPCI)

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After the total base RVUs are calculated, the payment rate can be determined according to this formula:

Payment Rate = Total Base RVUs × RBRVS Conversion Factor

The Indiana RBRVS conversion factor is \$26.8671.

Services are reimbursed using the IHCP Professional Fee Schedule if the following criteria are met:

- CPT coding is used for the service, or the service can be linked to an existing CPT code.
- The service is included in the Centers for Medicare & Medicaid Services (CMS) Medicare Physician Fee Schedule.
- RVUs exist for the service or have been developed for the service.
- The IHCP covers the procedure.

Procedures when the RVU is not appropriate: Most procedures with RVUs on the Medicare Physician Fee Schedule are reimbursed using the IHCP Professional Fee Schedule. Some procedures with RVUs, such as maternity and delivery services, are reimbursed at the lower of the submitted charge or the maximum fee allowed for that procedure, where the maximum fee is not determined using RVUs.

Procedures when the RVU is not available: Procedures on the Medicare Physician Fee Schedule that do not have RVUs to be used with the RBRVS methodology are reimbursed by the IHCP based on a maximum fee or manual pricing methodology. RVUs are not available for some procedures on the Medicare Physician Fee Schedule because the procedure is categorized as one of the following:

- Carrier-priced
- Excluded from the Medicare Physician Fee Schedule
- Not valid for Medicare
- Noncovered by Medicare
- Associated with special restrictions
- Excluded from the definition of physician services

IHCP-covered procedures that fall into one of these categories are reimbursed on the basis of the lower of the submitted charge or maximum allowed fee, or through manual pricing, depending on the specific procedure.

Laboratory procedures billed with modifier 26 – *Professional component* have RVUs and are priced using the IHCP Professional Fee Schedule. All other laboratory procedures are reimbursed according to the Medicare Clinical Laboratory Fee Schedule.

Radiological procedures with RVUs on the Medicare Physician Fee Schedule are reimbursed using the IHCP Professional Fee Schedule. Radiological procedures that do not have an RVU are reimbursed by the IHCP based on a maximum fee allowed or manual pricing methodology. The reimbursement for the technical component of outpatient radiology services billed on an institutional claim (*UB-04* claim form, 837I electronic transaction, or Provider Healthcare Portal institutional claim) is equal to the technical component rates identified on the IHCP Fee Schedule, resulting in the consistent technical component reimbursement for radiology services across all Medicaid providers.

Anesthesia services are also excluded from the RBRVS reimbursement methodology. The IHCP reimburses for anesthesiology services according to a statewide calculation on the total base units, time units, and add-on units, and based on specific modifiers for the procedure, multiplied by the anesthesia conversion factor established by the IHCP.

Special Payment Situations

Under RBRVS pricing, certain situations result in special payment provisions within the IHCP Professional Fee Schedule. The RBRVS payment methodology includes the use of certain pricing modifiers and other policies that have an impact on the payment amount.

Providers should place modifiers after the procedure code in field 24D on the *CMS-1500* claim form or in the equivalent modifier field on the 837P electronic transaction or Provider Healthcare Portal professional claim. The *Claim Submission and Processing* module provides additional information about modifiers.

Mid-Level Practitioners

To reflect differences in education and training, reimbursement for the following provider types under the IHCP Professional Fee Schedule is based on **less than** 100% of the Professional Fee Schedule amount:

- Physician assistants enrolled as type 10, specialty 100
- Independently practicing advanced practice nurses (APNs), enrolled as type 09, with the following specialties:
 - 090 Pediatric nurse practitioners
 - 091 Obstetric nurse practitioners
 - 092 Family nurse practitioners
 - 093 Nurse practitioners (other, such as clinical nurse specialists)
 - 095 Certified nurse midwives
- Independently practicing respiratory therapists
- Certified registered nurse anesthetists (CRNAs), enrolled as type 09, specialty 094
- Psychologists, other than health service providers in psychology (HSPPs), certified social workers, and certified clinical social workers providing outpatient mental health services in a physician-directed outpatient mental health facility in accordance with *Indiana Administrative Code 405 IAC 5-20-8*
- Licensed marriage and family therapists, and mental health counselors

CRNAs are reimbursed at 60% of the physician fee; all other mid-level practitioners mentioned in the preceding list are reimbursed at 75% of the physician fee.

In addition, the following providers are reimbursed at an adjusted rate as noted:

- Certified physical therapist assistants Identified procedures can be performed by a certified physical therapist assistant. These services must be billed with modifier HM and are reimbursed at 75% of the reimbursement for a physical therapist.
- Speech-language pathologist aides Identified procedures can be performed by speech-language
 pathologist aides. These services must be billed with the modifier HM and are reimbursed at 75% of
 the reimbursement for a speech-language pathologist.

Providers must submit claims with the appropriate modifier for the system to apply the correct reduction.

IHCP-enrolled mid-level practitioners associated with a group must use a unique, individual National Provider Identifier (NPI) when billing. For mid-level practitioners without an individual NPI, the supervising physician's NPI must be entered in the **rendering provider** field (in the bottom portion of field 24J on the *CMS-1500* claim form or equivalent field of the electronic claim), along with the appropriate modifier. The group provider NPI is entered in the **billing provider** field (in field 33a on the *CMS-1500* claim form or equivalent field of the electronic claim).

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Note: The following providers cannot enroll in the IHCP:

- Licensed marriage and family therapists
- Mental health counselors
- Physical therapist assistants
- Psychologists
- Respiratory therapists
- Social workers
- Speech-language pathologist aides

For these providers, the supervising physician or HSPP must submit claims on their behalf.

Advanced Practice Nurses

The IHCP requires all advanced practice nurses (APNs) to enroll as IHCP providers (specialties 090–095). The IHCP reimbursement rate for APNs *other than* CRNAs (specialty 094) depends on whether the APN is independently practicing or is employed by a physician or working in a physician-directed group or clinic, as follows:

- The IHCP reimburses independently practicing APNs (other than CRNAs) at 75% of the rate on file.
 - The APN must enter his or her NPI in the **rendering provider** field (in the bottom portion of field 24J on the *CMS-1500* claim form or equivalent field of the electronic claim). The NPI of the billing entity must be entered in the **billing provider** field (in field 33a on the *CMS-1500* claim form or equivalent field of the electronic claim).
- The IHCP reimburses APNs (other than CRNAs) who are employed by physicians or are working in a physician-directed group or clinic, at 100% of the Medicaid allowed amount. These APN services can be billed in the following ways:
 - Bill services with the SA modifier and enter the supervising physician's NPI in the rendering provider field. The NPI of the billing entity must be entered in the billing provider field.
 - Bill services using the APN's NPI in the rendering provider field. The NPI for the billing entity must be entered in the billing provider field.

Note: In all cases, medical records must clearly identify the provider that actually rendered the services.

All enrolled APNs, except for CRNAs, may be designated to serve as primary medical providers (PMPs) within the managed care delivery system. APNs serving as PMPs must bill using their own NPI for services rendered to members on their PMP panel.

Providers cannot bill separately for APN services in outpatient hospital settings and should include these services in the hospital outpatient reimbursement rate.

For CRNAs, the IHCP reimburses all services at 60% of the rate on file. See the *Anesthesia Services* module for additional CRNA billing and reimbursement information.

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Physician Assistants

Effective August 1, 2017, the IHCP requires all physician assistants to enroll as IHCP providers (type 10, specialty 100) as either a billing or a rendering provider. Physician assistant services cannot be billed under the supervising physician's NPI for dates of service on or after August 1, 2017. Instead, physician assistant services must be billed using the physician assistant's own NPI. The IHCP reimbursement rate for physician assistant services is 75% of the rate on file with the following exceptions:

- Physician assistant services for "assistant surgery" should be billed with the physician assistant's NPI as well as the AS modifier; reimbursement for these services is paid at 20% of the already reduced rate (20% of 75%).
- Physician assistant services rendered through an FQHC/RHC should be billed using the physician assistant's NPI as the rendering provider; reimbursement for these services is based on providerspecific encounter methodology.

Surgery-Related Modifiers Affecting Payment

In addition to the payment differential for mid-level practitioners, the following pricing modifiers and policies related to surgical services billed on the professional claim have an impact on the payment amount:

Assistant surgeon modifier – Providers that bill as surgical assistants must use modifiers 80 – Assistant surgeon, 81 – Minimum assistant surgeon, or 82 – Assistant surgeon (when qualified resident surgeon not available). Payment is made at 20% of the IHCP Professional Fee Schedule amount.

Note: Providers billing for physician assistants acting as assistant surgeons should use the AS modifier.

- Cosurgeon modifier Providers that bill as cosurgeons must use modifier 62 Two surgeons. The IHCP reimburses these claims at 62.5% of the IHCP Professional Fee Schedule amount.
- Intraoperative services only Physicians who provide services for only the intraoperative component of surgery, such as services that are usually considered part of the surgical procedure, are reimbursed a percentage of the IHCP Professional Fee Schedule amount for the surgical procedure code. Adding modifier 54 Surgical care only to the procedure code identifies when one physician performs a surgical procedure and another physician provides preoperative and postoperative management of surgical services.
- Postoperative services only Providers that perform postoperative services but did not perform the
 surgery must bill using modifier 55 Postoperative management only. These providers are reimbursed
 a percentage of the IHCP Professional Fee Schedule amount. The percentage adjustment for modifiers
 54 and 55 is specific to the surgical procedure.
- *Preoperative care only* The IHCP does not recognize modifier 56 *Preoperative care only* as a valid modifier. If a provider bills modifier 56, the Core Medicaid Management Information System (*Core*MMIS) denies the detail for modifier 56 and generates an invalid modifier message.
- Return to surgery If a patient is returned to surgery for a related procedure during the postoperative period and billed using modifier 78 Return to the operating/procedure room for a related procedure during the postoperative period, the percentage adjustment for modifier 78 is specific to the surgical procedure.
- *Bilateral surgery* When billing for bilateral procedures, modifier 50 *Bilateral procedure* must be reported on the claim if the procedure code itself is not described as a bilateral procedure. If the procedure code is described as bilateral, modifier 50 should not be reported. Effective February 13, 2017, IHCP reimbursement for bilateral procedures is based on the Medicare Physician Fee Schedule relative value file status indicators, as described in the *Surgical Services* module.

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- *Multiple procedures* When multiple surgical procedures, identified by modifier 51 *Multiple procedures*, are performed by the same physician in the same operative session, multiple surgery reductions apply to the procedures based on the following adjustments for physician claims:
 - 100% of the global fee for the most expensive procedure
 - 50% of the global fee for the second most expensive procedure
 - 25% of the global fee for the remaining procedures

For more information on surgical services, including details about using these modifiers, see the *Surgical Services* module.

Provider Preventable Conditions

The IHCP does not cover surgical or other invasive procedures to treat particular medical conditions when a practitioner performs a surgery or invasive procedure erroneously. The IHCP also does not cover services related to these noncovered procedures, including all services provided in the operating room when an error occurs. All providers in the operating room when the error occurs, that could bill individually for their services, are not eligible for payment. All related services provided during the same hospitalization in which the error occurred are not covered.

The following provider preventable conditions (PPC) modifiers must be submitted on physician, physician crossover, and physician crossover Medicare Replacement Plan claims indicating errors:

- PA Surgery wrong body part
- PB Surgery wrong patient
- PC Wrong surgery on patient

Site-of-Service Payment Adjustment

When procedures that are normally performed in a physician's office are provided in outpatient places of service 19 - Off campus-outpatient hospital, 22 - On campus-outpatient hospital, 23 - Emergency room, or 62 - Comprehensive outpatient rehabilitation facility, these procedures are subject to a site-of-service payment adjustment that is 80% of the practice expense component of the statewide IHCP <u>Professional Fee Schedule</u>.

Reimbursement for Notification of Pregnancy

Recognized providers that complete and submit (via the Provider Healthcare Portal) a Notification of Pregnancy (NOP) form for a managed care member – including current and accurate demographics, any high-risk pregnancy indicators identified at the office visit, and basic pregnancy information – may be eligible for a \$60 incentive payment. The procedure code used to provide payment, 99354 TH, is noncovered for fee-for-service members.

For questions regarding completion of the NOP, please contact your <u>IHCP Provider Relations field consultant</u>. For more information on the NOP, see the <u>Obstetrical and Gynecological Services</u> module and the <u>Notification for Pregnancy</u> page at indianamedicaid.com.

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Reimbursement for Electronic Health Records Incentive Program

Eligible professionals can register with the CMS and the IHCP for the Electronic Health Records (EHR) Incentive Program. Reimbursement for adopting, implementing, upgrading, or demonstrating meaningful use of certified EHR technology are reimbursed through the Indiana Medicaid EHR Incentive Program payment system – Medical Assistance Provider Incentive Repository (MAPIR), accessible via the Portal.

See the *Indiana Medicaid Electronic Health Records Incentive Program* page at indianamedicaid.com for details about the EHR Incentive Program and MAPIR payment system.

B-Bundled Codes Not Separately Reimbursable

The IHCP does not separately reimburse certain CPT and HCPCS codes with a designated status of "B" (indicating a bundled procedure) by the CMS Medicare Physician Fee Schedule Relative Value File. B-bundled codes are not reimbursable services, regardless of whether they are billed alone or in conjunction with other services on the same date.

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